1 2 3 4 5 6 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 7 AT SEATTLE 8 PHOENIX FILMS PROPRIETARY LIMITED, an Australian company; No. 2:11-cv-01990-JLR 9 LEGACY PRODUCTIONS LIMITED, a New Zealand company; and WARRIOR 10 WITHIN PROPRIETARY LIMITED, an FIRST AMENDED COMPLAINT Australian company, FOR DAMAGES AND 11 INJUNCTIVE RELIEF Plaintiffs, 12 **DEMAND FOR JURY TRIAL** 13 AMAZON.COM, INC., a Washington 14 corporation; BAKER & TAYLOR, INC., a Delaware corporation; INGRAM 15 ENTERTAINMENT, INC., a Tennessee corporation; and ALLUMINATION 16 FILMWORKS LLC, a Delaware limited liability company, 17 Defendants. 18 COME NOW Plaintiffs Phoenix Films Proprietary Limited, Legacy Productions 19 Limited, and Warrior Within Proprietary Limited, by and through their attorneys Meltzer 20 Grant LLC, and allege as follows: 21 22 MELTZER GRANT LLC FIRST AMENDED COMPLAINT FOR DAMAGES AND

FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF – 1

MELTZER GRANT LLC 107 SE WASHINGTON ST. #410 PORTLAND, OR 97214 503-345-6912

PARTIES

- 1. Plaintiff Phoenix Films Proprietary Limited ("Phoenix") is an Australian company doing business internationally, including Japan, New Zealand, Hong Kong, and the United States. Specifically, Phoenix owns and distributes the documentary film The
 Intercepting Fist, which is part of the intellectual property at issue in this lawsuit.
- 2. Plaintiff Legacy Productions Limited ("Legacy") is a New Zealand company doing business internationally, including Japan, Australia, Hong Kong, and the United States. Specifically, Legacy owns and distributes the film Bruce Lee's Jeet Kune Do, which is part of the intellectual property at issue in this lawsuit.
- 3. Plaintiff Warrior Within Proprietary Limited ("Warrior Within") is an Australian company doing business internationally, including Japan, New Zealand, Hong Kong, and the United States. Specifically, Warrior Within owns and distributes the documentary film Bruce Lee: Path of the Dragon (collectively, with Bruce Lee's Jeet Kune Do and The Intercepting Fist, the "Films"), which is part of the intellectual property at issue in this lawsuit.
 - 4. Both Legacy and Warrior Within are wholly owned subsidiaries of Phoenix.
- 5. Upon information and belief, Defendant Amazon.com, Inc. ("Amazon") is a Washington corporation with its principal place of business at 410 Terry Avenue North, Seattle, Washington 98109-5210.
- 6. Upon information and belief, Defendant Baker & Taylor, Inc. ("Baker & Taylor") is a Delaware corporation with its principal place of business at 2550 West Tyvola Road, Suite 300, Charlotte, North Carolina 28217.

- Upon information and belief, Defendant Ingram Entertainment, Inc. 7. ("Ingram") is a Tennessee Corporation with its principal place of business at Two Ingram Blvd., La Vergne, Tennessee 37089.
- Upon information and belief, Defendant Allumination Filmworks LLC is a 8. Delaware Limited Liability Company with its principal place of business at 21250 Califa Street, Suite 102, Woodland Hills, California 91367.

JURISDICTION AND VENUE

- This is a civil action seeking damages and injunctive relief for copyright 9. infringement, falsification of copyright management information, and removal or alteration of copyright management information.
 - Phoenix, Legacy, and Warrior Within are alien plaintiffs. 10.
- The Court has original subject matter jurisdiction over this action pursuant to 11. the provisions of the Copyright Act of 1976 (the "Copyright Act"), 17 U.S.C. § 101 et seq, 28 U.S.C. §§ 1338 (a) and (b), and 28 U.S.C. § 1331.
- 12. The Court has personal jurisdiction over the Defendants, who have sufficiently continuous, systematic, and routine contacts with Washington to establish such jurisdiction. Wrongful acts of the Defendants alleged herein occurred in and caused injury to Plaintiffs in Washington.
- Venue in Federal District Court for the Western District of Washington is proper 13. pursuant to 28 U.S.C. §§ 1391(b)(2) and (c).

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BACKGROUND

- 14. Plaintiff Legacy is in the business of producing and distributing films, including the documentary film <u>Bruce Lee's Jeet Kune Do</u>. This film is a premium product and a one of a kind work, featuring the only known footage of Bruce Lee describing his groundbreaking Jeet Kune Do philosophy of mixed martial arts.
- 15. Mr. Lee is a celebrated cultural icon around the world and his image is instantly recognizable.
- 16. Legacy produced <u>Bruce Lee's Jeet Kune Do</u> in cooperation with and under license from the Estate of Bruce Lee.
- of the United States. Legacy registered the work with the United States Copyright Office and received copyright certificate # PA-827-004, effective July 28, 1996. The film contains a copyright notice in its opening credits showing Legacy as the copyright holder, and such copyright notice is also present on the cover of previously authorized reproductions of the film. Attached hereto as Exhibit A is a correct and true copy of the copyright registration.
- 18. Plaintiff Phoenix is in the business of producing and distributing films, including the film The Intercepting Fist. This documentary film is a premium product and a one of a kind work, featuring behind the scenes and rare footage of Mr. Lee.
- 19. Phoenix produced <u>The Intercepting Fist</u> in cooperation with and under license from the Estate of Bruce Lee.
- 20. <u>The Intercepting Fist</u> is the subject of copyright protection under the laws of the United States. Phoenix registered the work with the United States Copyright Office and

received copyright certificate # PA1-032-415, effective February 27, 2001. This film contains a copyright notice in its closing credits showing Phoenix as the copyright holder, and such copyright notice is also present on the cover of previously authorized reproductions of the film. Attached hereto as Exhibit B is a correct and true copy of the copyright registration.

- 21. Plaintiff Warrior Within is in the business of producing and distributing films, including the film Bruce Lee: Path of the Dragon. This documentary film is a premium product and a one of a kind work, featuring behind the scenes and rare footage of Mr. Lee. Warner Bros. Entertainment, Inc.'s popular movie review website, rottentomatoes.com, describes Bruce Lee: Path of the Dragon as "one of the best [documentaries] on Lee" (see http://www.rottentomatoes.com/m/path_of_the_dragon/, accessed November 29, 2011, 1:58 pm PST).
- 22. Warrior Within produced <u>Bruce Lee: Path of the Dragon</u> in cooperation with and under license from the Estate of Bruce Lee.
- Bruce Lee: Path of the Dragon is the subject of copyright protection under the laws of the United States. Warrior Within registered the work with the United States Copyright Office and received copyright certificate # PA 891-718, effective April 21, 1998. This film contains a copyright notice in its closing credits showing Warrior Within as the copyright holder, and such copyright notice is also present on the cover of previously authorized reproductions of the film. Attached hereto as Exhibit C is a correct and true copy of the copyright registration.

24.	On or around July 1, 2009, Legacy discovered that a low quality DVD version of
Bruce Lee's J	eet Kune Do had been created, reproduced, imported into the United States, and
sold without	authorization.

- 25. Legacy's investigation revealed that Modern Audio Ltd., a Hong Kong company, had created the videos in Hong Kong, which were later imported and distributed by a large American home entertainment company. That matter was the subject of a lawsuit in this Court, Case No. 2:09-cv-1822 RAJ, *Legacy Productions Limited v. U2 Home Entertainment Inc. et al* ("Lawsuit"). The Lawsuit was resolved on September 7, 2010, before trial.
- 26. After the resolution of the Lawsuit, Legacy discovered that <u>Bruce Lee's Jeet Kune Do</u> continued to be reproduced and distributed without authorization. Further investigation into these continued distributions also revealed unauthorized reproductions and distributions of <u>The Intercepting Fist</u> and <u>Bruce Lee: Path of the Dragon</u>.
- 27. On information and belief, Amazon has sold and distributed a yet-to-be determined number of copies of the Films in Washington and elsewhere, either directly to consumers, through third party distributors and retailers, or both.
- 28. On information and belief, Baker & Taylor has sold and distributed a yet-to-be determined number of copies of the Films in Washington and elsewhere, either directly to consumers, through third party distributors and retailers, or both.
- 29. On information and belief, Ingram has sold and distributed a yet-to-be determined number of copies of the Films in Washington and elsewhere, either directly to consumers, through third party distributors and retailers, or both.

- 30. On information and belief, Allumination has created, manufactured, sold, and/or distributed a yet-to-be determined number of copies of the Films in Washington and elsewhere, either directly to consumers, through third party distributors and retailers, or both.
- 31. The unauthorized reproduction and distribution of the Films have caused Legacy, Phoenix, and Warrior Within to suffer damages in Washington.

FIRST CAUSE OF ACTION—COPYRIGHT INFRINGEMENT OF BRUCE LEE'S JEET KUNE DO

- 32. Plaintiff Legacy incorporates paragraphs 1 through 31 above, as though fully set forth herein.
- 33. Legacy holds a valid and exclusive copyright to <u>Bruce Lee's Jeet Kune Do</u> that is a subject of this action and that is evidenced by its copyright registration certificate.
- 34. As set forth above, despite the copyright notice in the opening credits of the film and on the product packaging of authorized and unauthorized copies of the film, Defendant Amazon willfully distributed copies of Bruce Lee's Jeet Kune Do without Legacy's authorization.
- 35. Legacy first sent legal notice of copyright infringement to Amazon on July 13,2009.
- 36. On July 20, 2009, Amazon's Copyright/Trademark Agent, Adrian Garver, wrote that Amazon was in the process of removing "Bruce Lee's Jeet Kune Do" from Amazon.com.
- 37. On July 24, 2009, and again on September 16, 2009, Legacy formally requested further information from Amazon regarding the infringement, but received no response.

38.	Although Legacy believed that its Lawsuit against U2 Home Entertainment had
resolved the	infringements, Legacy discovered that Amazon continued to sell an unauthorized
version of Bi	ruce Lee's Jeet Kune Do with reckless disregard to Legacy's copyright.

- 39. Accordingly, Legacy again sent legal notice of copyright infringement to Amazon and one of its sellers, Clyde Parks, on January 4, 2011.
- 40. On January 5, 2011, Amazon's Copyright/Trademark Agent, Adrian Garver, again wrote that Amazon was in the process of removing the film.
- 41. Garver further wrote that <u>Bruce Lee's Jeet Kune Do</u> "was supplied by the distributors Baker & Taylor, Ingram and Allumination filmworks [sic]."
- 42. The actions and conduct by Defendant Amazon infringe upon Legacy's exclusive 17 U.S.C. § 106 rights.
- 43. Such actions and conduct constitute copyright infringement under 17 U.S.C. § 501.
- 44. As a result of the copyright infringement described above, Legacy is entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.
- 45. As set forth above, despite the copyright notice in the opening credits of the film and on the product packaging of authorized and unauthorized copies of the film, Defendant Baker & Taylor willfully distributed copies of <u>Bruce Lee's Jeet Kune Do</u> without Legacy's authorization.

- After investigating and confirming Baker & Taylor's illegal actions, Legacy first 46. sent legal notice of copyright infringement to Baker & Taylor on September 10, 2009. Baker & Taylor did not respond.
- Although Legacy believed that its Lawsuit against U2 Home Entertainment had 47. resolved the infringements, Legacy received notice from Amazon on January 5, 2011, that Baker & Taylor continued to distribute Bruce Lee's Jeet Kune Do without Legacy's authorization.
- 48. On January 24, 2011, Legacy again sent legal notice of copyright infringement to Baker & Taylor. Again, Baker & Taylor did not respond.
- The actions and conduct by Defendant Baker & Taylor infringe upon Legacy's 49. exclusive 17 U.S.C. § 106 rights.
- 50. Such actions and conduct constitute copyright infringement under 17 U.S.C. § 501.
- As a result of the copyright infringement described above, Legacy is entitled to 51. relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.
- As set forth above, despite the copyright notice in the opening credits of the film 52. and on the product packaging of authorized and unauthorized copies of the film, Defendant Ingram willfully distributed copies of Bruce Lee's Jeet Kune Do without Legacy's authorization.
- In the course of its investigation, Legacy received correspondence from John J. 53. Fletcher, counsel for Ingram, on September 11, 2009. In his correspondence, Mr. Fletcher wrote that while Ingram had purchased its copies from various distributors, it would no longer make the film available for purchase.

- 54. Although Legacy believed that its Lawsuit against U2 Home Entertainment had resolved the infringements, Legacy received notice from Amazon on January 5, 2011, that Ingram continued to distribute <u>Bruce Lee's Jeet Kune Do</u> without Legacy's authorization and in reckless disregard of Legacy's copyright.
- 55. The actions and conduct by Defendant Ingram infringe upon Legacy's exclusive 17 U.S.C. § 106 rights.
- 56. Such actions and conduct constitute copyright infringement under 17 U.S.C. § 501.
- 57. As a result of the copyright infringement described above, Legacy is entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.
- 58. As set forth above, despite the copyright notice in the opening credits of the film and on the product packaging of authorized and unauthorized copies of the film, Defendant Allumination willfully reproduced (or caused to be reproduced) and distributed copies of Bruce Lee's Jeet Kune Do without Legacy's authorization.
- 59. Although Legacy believed that its Lawsuit against U2 Home Entertainment had resolved the infringements, Legacy received notice from Amazon on January 5, 2011, that Allumination was distributing Bruce-Lee's Jeet Kune-Do without Legacy's authorization.
- 60. Legacy sent formal legal notice of copyright infringement to Allumination on January 24, 2011.
- 61. Although Legacy sought to resolve this matter outside of Court, Allumination denied that it distributed <u>Bruce Lee's Jeet Kune Do</u>.

62.	The actions and c	onduct by Defe	endant Allum	ination infring	e upon Legacy's
exclusive 17 U	J.S.C. § 106 rights.				

- 63. Such actions and conduct constitute copyright infringement under 17 U.S.C. § 501.
- 64. As a result of the copyright infringement described above, Legacy is entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.

SECOND CAUSE OF ACTION—COPYRIGHT INFRINGEMENT OF BRUCE LEE: PATH OF THE DRAGON

- 65. Plaintiff Warrior Within incorporates paragraphs 1 through 64 above, as though fully set forth herein.
- 66. Warrior Within holds a valid and exclusive copyright to <u>Bruce Lee: Path of the Dragon</u> that is a subject of this action and that is evidenced by its copyright registration certificate.
- 67. <u>Bruce Lee: Path of the Dragon</u> was previously reproduced and distributed with authorization in the United States by United American Video in VHS and DVD formats.
- 68. As set forth above, despite the copyright notice in the closing credits of the film and on the product packaging of authorized copies of the film, Defendant Allumination willfully reproduced (or caused to be reproduced) and distributed copies of <u>Bruce Lee: Path of the Dragon</u> without Warrior Within's authorization.

- 69. Although Warrior Within, through its parent company Phoenix Films, sought to resolve this matter outside of Court, Allumination denied that it reproduced or caused to be reproduced and distributed copies of <u>Bruce Lee: Path of the Dragon</u>.
- 70. The actions and conduct by Defendant Allumination infringe upon Warrior Within's exclusive 17 U.S.C. § 106 rights.
- 71. Such actions and conduct constitute copyright infringement under 17 U.S.C. § 501.
- 72. As a result of the copyright infringement described above, Warrior Within is entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.
- 73. As set forth above, despite the copyright notice in the closing credits of the film and on the product packaging of authorized copies of the film, Defendant Amazon willfully distributed copies of Bruce Lee: Path of the Dragon without Warrior Within's authorization.
- 74. The actions and conduct by Defendant Amazon infringe upon Warrior Within's exclusive 17 U.S.C. § 106 rights.
- 75. Such actions and conduct constitute copyright infringement under 17 U.S.C. § 501.
- 76. As a result of the copyright infringement described above, Warrior Within is entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.
- 77. As set forth above, despite the copyright notice in the closing credits of the film and on the product packaging of authorized copies of the film, Defendant Baker & Taylor

The actions and conduct by Defendant Baker & Taylor infringe upon Warrior Such actions and conduct constitute copyright infringement under 17 U.S.C. § As a result of the copyright infringement described above, Warrior Within is entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest. As set forth above, despite the copyright notice in the closing credits of the film and on the product packaging of authorized copies of the film, Defendant Ingram willfully distributed copies of Bruce Lee: Path of the Dragon without Warrior Within's authorization. The actions and conduct by Defendant Ingram infringe upon Warrior Within's Such actions and conduct constitute copyright infringement under 17 U.S.C. § As a result of the copyright infringement described above, Warrior Within is entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.

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THIRD CAUSE OF ACTION—COPYRIGHT INFRINGEMENT OF THE INTERCEPTING FIST

- 85. Plaintiff Phoenix incorporates paragraphs 1 through 84 above, as though fully set forth herein.
- 86. Phoenix holds a valid and exclusive copyright to <u>The Intercepting Fist</u> that is a subject of this action and that is evidenced by its copyright registration certificate.
- 87. The Intercepting Fist was previously reproduced and distributed with authorization in the United States by United American Video in VHS and DVD formats.
- 88. As set forth above, despite the copyright notice in the closing credits of the film and on the product packaging of authorized copies of the film, Defendant Allumination willfully reproduced (or caused to be reproduced) and distributed copies of The Intercepting Fist without Phoenix's authorization.
- 89. Although Phoenix sought to resolve this matter outside of Court, Allumination denied that it reproduced or caused to be reproduced and distributed copies of <u>The</u>
 Intercepting Fist.
- 90. The actions and conduct by Defendant Allumination infringe upon Phoenix's exclusive 17 U.S.C. § 106 rights.
- 91. Such actions and conduct constitute copyright infringement under 17 U.S.C. § 501.
- 92. As a result of the copyright infringement described above, Phoenix is entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.

- 93. As set forth above, despite the copyright notice in the closing credits of the film and on the product packaging of authorized copies of the film, Defendant Amazon willfully distributed copies of <a href="https://doi.org/10.1007/jhearth-10.2007/jhear
- 94. The actions and conduct by Defendant Amazon infringe upon Phoenix's exclusive 17 U.S.C. § 106 rights.
- 95. Such actions and conduct constitute copyright infringement under 17 U.S.C. § 501.
- 96. As a result of the copyright infringement described above, Phoenix is entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.
- 98. The actions and conduct by Defendant Baker & Taylor infringe upon Phoenix's exclusive 17 U.S.C. § 106 rights.
- 99. Such actions and conduct constitute copyright infringement under 17 U.S.C. § 501.
- 100. As a result of the copyright infringement described above, Phoenix is entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.

101.	As set forth above, despite the copyright notice in the closing credits of the film
and on the pr	oduct packaging of authorized copies of the film, Defendant Ingram willfully
distributed co	opies of The Intercepting Fist without Phoenix's authorization.

- 102. The actions and conduct by Defendant Ingram infringe upon Phoenix's exclusive 17 U.S.C. § 106 rights.
- 103. Such actions and conduct constitute copyright infringement under 17 U.S.C. § 501.
- 104. As a result of the copyright infringement described above, Phoenix is entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.

FOURTH CAUSE OF ACTION—REMOVAL OR ALTERATION OF COPYRIGHT MANAGEMENT INFORMATION

- 105. Plaintiffs reincorporate paragraphs 1 104 above, as though fully set forth herein.
- 106. By causing to be placed or placing names and logos on unauthorized copies of The Intercepting Fist and Bruce Lee: Path of the Dragon that it distributed, Defendant Allumination, without authority, intentionally removed or altered copyright management information; distributed copies of The Intercepting Fist and Bruce Lee: Path of the Dragon knowing that copyright management information had been removed or altered; and did so knowing or having reasonable grounds to know that its actions will induce, enable, facilitate, or conceal an infringement.

107.	Such actions and conduct constitute the removal or alteration of copyright
management i	information under 17 U.S.C. § 1202(b).

108. As a result of the removal or alteration of copyright management information as described above, Phoenix is entitled to relief including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.

FIFTH CAUSE OF ACTION—FALSIFICATION OF COPYRIGHT MANAGEMENT INFORMATION

- 109. Plaintiffs reincorporate paragraphs 1 through 108 above, as though fully set forth herein.
- 110. By causing to be placed or placing names and logos on unauthorized copies of The Intercepting Fist and Bruce Lee: Path of the Dragon that it distributed, Defendant Allumination knowingly and with the intent to enable, facilitate, or conceal infringement, provided false copyright management information and distributed copyright management information that is false.
- 111. Such actions and conduct constitute the falsification of copyright management information under 17 U.S.C. § 1202(a).
- 112. As a result of the falsification of copyright management information, Legacy is entitled to relief including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.

FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF – 18

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for the following relief:

A. On the First Cause of Action, for an award of actual damages and profits pursuant to 17 U.S.C. § 504(b), or for an award of statutory damages of not less than \$750 or more than \$30,000 per copy pursuant to 17 U.S.C. § 504(c)(1), or for an award of statutory damages up to \$150,000 upon a finding of willful infringement pursuant to 17 U.S.C. § 504(c)(2). And for an order permanently enjoining Defendants from infringing Plaintiff Legacy's copyrighted film pursuant to 17 U.S.C. § 502. And for an order impounding, destroying, or otherwise disposing of infringing articles pursuant to 17 U.S.C. § 503. And for an award of costs and attorney's fees pursuant to 17 U.S.C. § 505.

- B. On the Second Cause of Action, for an award of actual damages and profits pursuant to 17 U.S.C. § 504(b), or for an award of statutory damages of not less than \$750 or more than \$30,000 per copy pursuant to 17 U.S.C. § 504(c)(1), or for an award of statutory damages up to \$150,000 upon a finding of willful infringement pursuant to 17 U.S.C. § 504(c)(2). And for an order permanently enjoining Defendants from infringing Plaintiff Warrior Within's copyrighted film pursuant to 17 U.S.C. § 502. And for an order impounding, destroying, or otherwise disposing of infringing articles pursuant to 17 U.S.C. § 503. And for an award of costs and attorney's fees pursuant to 17 U.S.C. § 505.
- C. On the Third Cause of Action, for an award of actual damages and profits pursuant to 17 U.S.C. § 504(b), or for an award of statutory damages of not less than \$750 or more than \$30,000 per copy pursuant to 17 U.S.C. § 504(c)(1), or for an award of statutory damages up to \$150,000 upon a finding of willful infringement pursuant to 17 U.S.C. § 504(c)(2). And for an

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order permanently enjoining Defendants from infringing Plaintiff Phoenix's copyrighted film pursuant to 17 U.S.C. § 502. And for an order impounding, destroying, or otherwise disposing of infringing articles pursuant to 17 U.S.C. § 503. And for an award of costs and attorney's fees pursuant to 17 U.S.C. § 505.

- D. On the Fourth Cause of Action, for an award of actual damages and any additional profits of the violator pursuant to 17 U.S.C. § 1203(c)(1)(A), or for statutory damages of not less than \$2,500 or more than \$25,000 per violation pursuant to 17 U.S.C. § 1203(c)(1)(B), or for treble damages pursuant to 17 U.S.C. § 1203(c)(4). And for an order permanently enjoining Allumination from removing or altering Plaintiffs' copyright management information pursuant to 17 U.S.C. § 1203(b)(1). And for an order impounding any device or product that is in the custody or control of any Defendant pursuant to 17 U.S.C. § 1203(b)(2). And for an award of costs and attorney's fees pursuant to 17 U.S.C. §§ 1203(b)(4)-(5). And for an order of remedial modification or destruction of any device or product involved in the violation pursuant to 17 U.S.C. § 1203(b)(6).
- E. On the Fifth Cause of Action, for an award of actual damages and any additional profits of the violator pursuant to 17 U.S.C. § 1203(c)(1)(A), or for statutory damages of not less than \$2,500 or more than \$25,000 per violation pursuant to 17 U.S.C. § 1203(c)(1)(B), or for treble damages pursuant to 17 U.S.C. § 1203(c)(4). And for an order permanently enjoining Allumination from falsifying Plaintiffs' copyright management information pursuant to 17 U.S.C. § 1203(b)(1). And for an order impounding any device or product that is in the custody or control of any Defendant pursuant to 17 U.S.C. § 1203(b)(2). And for an award of costs and attorney's fees pursuant to 17 U.S.C. §§ 1203(b)(4)-(5). And for an order of remedial

1	modification or destruction of any device or product involved in the violation pursuant to 17
2	U.S.C. § 1203(b)(6).
3	F. For prejudgment interest on the amount of the award to Plaintiff;
4	G. And for such other and further relief as the Court deems equitable, proper, and just
5	
6	DATED: December 21, 2011
7	
8	MELTZER GRANT LLC
9	by s/ Eric S. Meltzer by s/ John E. Grant, III
10	Eric S. Meltzer WSBA #40203 John E. Grant, III WSBA #39539
11	107 SE Washington St., Suite 410 Portland, OR 97214
12	T: 503-953-1082 F: 503-345-6912
13	E: eric@meltzergrant.com E: john@meltzergrant.com
14	Attorneys for Plaintiffs
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EXHIBIT A

COPYRIGHT CERTIFICATE PA-827-004

FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF – EXHIBIT A

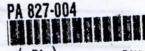
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Case 2:11-cv-01990-JLR Document 5 Filed 12/21/11 Page 22 of 29 CERTIFICATE OF REGISTRATION



FORM PA This Certificate issued under the seal of the Copyright For a Work Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.



Marybeth Peters EFFECTIVE DATE OF REGISTRATION

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EXHIBIT B

COPYRIGHT CERTIFICATE PA1-032-415

FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF – EXHIBIT B

MELTZER GRANT LLC 107 SE WASHINGTON ST. #410 PORTLAND, OR 97214 503-345-6912

CERTIFICATE OF REGISTRIAPPIONE Document 5 Filed 12/21/11 Page 25 of 29

NITED STATES COPYRIGHT OFFICE

EGISTRATION NUMBER





This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

PA 1-032-415

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EXHIBIT C

COPYRIGHT CERTIFICATE PA891-718

FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF – EXHIBIT C

MELTZER GRANT LLC 107 SE WASHINGTON ST. #410 PORTLAND, OR 97214 503-345-6912





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